## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a )
SHAREHOLDER.COM, )

Plaintiff, )

V. Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON )
CORPORATION, ROBERT I. ADLER, )
JOHN DOES 1 THROUGH 5, )
AND JANE DOES 1 THROUGH 5, )
Defendants. )

## PLAINTIFF SHAREHOLDER.COM'S MOTION TO IMPOUND ITS OPPOSITION TO DEFENDANT ADLER'S MOTION FOR LEAVE TO TAKE ADDITIONAL DEPOSITIONS OF PERSONS PREVIOUSLY DEPOSED BY DEFENDANT CCBN.COM

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of it Shareholder.com Opposition to Defendant Adler's Motion For Leave To Take Additional Depositions of Persons Previously Deposed By Defendant CCBN.com, which is being delivered by hand to the Court today. The motion discusses and attaches excerpts of deposition transcript that have been designated as "Highly Confidential" under the Stipulated Protective Order in the case. See Docket No. 37. Under that Order, Shareholder.com is required to seek impoundment of any documents filed with the Court containing "Confidential" or "Highly Confidential" information. See id. at ¶ 14. Shareholder accordingly moves for impoundment.

Respectfully submitted,

DIRECT REPORT CORPORATION d.b.a. SHAREHOLDER.COM

By its attorneys,

Robert S./Frank, Jr. (BBO# 177240) Carlos Perez-Albuerne (BBO# 640446)

CHOATE, HALL & STEWART

Two International Place Boston, MA 02110 (617) 248-5000

Dated: September 30, 2005

Carlos Perez-Albuerne

## **CERTIFICATE OF SERVICE**

I, Carlos Perez-Albuerne, hereby certify that a true copy of this document was served by hand on this 30th day of September, 2005 upon Defendants, CCBN.com and the Thompson Corporation by delivering a copy of same to:

> Anthony S. Fiotto David M. Moss Goodwin Procter, LLP Exchange Place Boston, MA 02109 617-570-1324

Fax: 617-523-1231

and by hand to Defendant, Robert Adler:

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